

# GREEN KAMINER MIN & ROCKMORE LLP

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April 9, 2025

**VIA ECF**

Honorable Natasha C. Merle  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201  
Email: Merle\_Chambers@nyed.uscourts.gov

*Re: Correa Morales v. Escobar Restrepo*  
Case No. 1:24-cv-07951-NCM-TAM

Dear Judge Merle:

I am writing to respectfully bring to the Court's attention a violation of the court order issued on January 17, 2025 (ECF No. 26). The parties previously entered into a consent order that specifically set forth a schedule for Mr. Correa to have daily video calls with L.C. from 7:00 PM to 8:00 PM on weekdays, as well as an additional call on weekends from 10:00 AM to 11:00 AM. The order further specifies that these calls are to occur via the WhatsApp platform.

As of April 3, 2025, Respondent Juliana Escobar Restrepo has failed to comply with the access arrangement outlined in the consent order (ECF No. 26 at 2) by refusing to allow Petitioner to engage in any of the scheduled video calls. Specifically, to this day, the Respondent has ignored all calls placed by the Petitioner during the designated times. A screenshot of the parties' WhatsApp correspondence, which demonstrates the Respondent's non-compliance, is annexed hereto as **Exhibit A**.

Given the foregoing, Petitioner respectfully requests a pre-motion conference to address the issues referenced herein. Thank you for your time and consideration of this matter.

Very truly yours,

/s/Richard Min  
Richard Min  
*Attorney for Petitioner*

cc: All Counsel (by ECF)

# EXHIBIT A





